February 10, 2003

Mr. Raymond Doss
Front Line Manufacturing, Inc.
P. O. Box 176
Leesburg, IN 46538

Re: 085-17139
First Administrative Amendment to
Part 70 085-10773-00077

Dear Mr. Doss:

Front Line Manufacturing, Inc. was issued a Part 70 permit on March 29, 2000, for a stationary shower tub and sink manufacturing operation. A letter requesting an administrative amendment was received on January 23, 2003. According to 326 IAC 2-7-11(a)(7), an administrative amendment can be used for changes that "revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.1 is amended as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary shower tub and sink manufacturing operation.

Responsible Official:	Ray Doss
Source Address:	~~County Road 2466, North 200 West, Warsaw, Indiana 46538~~
	2466 North, 200 West, Warsaw, IN 46580
Mailing Address:	P.O. Box 176, Leesburg, Indiana 46538
Phone Number:	219-269-1794
SIC Code:	3714
County Location:	Kosciusko

(2) Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively;

(b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X;

~~(c) one (1) marble spray gun, identified as (SG4), with a maximum capacity of 7.2 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and~~

~~exhausting to one (1) stack identified as SG4X;~~

~~(d) one (1) marble casting operation, identified as (MC), with a maximum capacity of 44.84 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X;~~

.....

(~~h~~ **f**) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using ~~a dust collection system~~ **dry filters** as particulate control, and exhausting to stack**s** GX**1 and GX2**.

(3) Section A.3(b) is amended as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

.....

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a**n internal** dust collection system as particulate control~~, and exhausting to stack TX.~~

(4) Facility description in Section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]

(a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively; **and**

(b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X~~;~~**.**

~~(c) one (1) marble spray gun, identified as (SG4), with a maximum capacity of 7.2 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X; and~~

~~(d) one (1) marble casting operation, identified as (MC), with a maximum capacity of 44.84 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X.~~

(5) Section D.1.1 is amended as follows:

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel and chop spray guns (ID SG1~~, SG4~~ **SG3**) shall be the following:

(6) Section D.1.3 is amended as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
chop spray gun ID SG1	0.29	1.77
chop spray gun ID SG2	0.29	1.77
gel spray gun ID SG3	0.11	0.93
~~marble casting spray gun ID SG4~~	~~0.00~~	~~0.10~~
~~Marble Casting ID MC~~	~~0.02~~	~~0.32~~

(7) Section D.1.8 is amended as follows:

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel and chop spray guns (ID SG1- ~~SG4~~ **SG3**) are in operation.

(8) Section D.1.9 is amended as follows:

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel spray gun~~,~~ **and** chop spray gun ~~and marble casting~~ stacks (ID SG1X- ~~SG4X~~ **SG3X**) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(9) Facility description in Section D.3 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]
(a) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to the interior of the building;
(b) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using ~~a dust collection system~~ **dry filters** as particulate control, and exhausting to stack**s** GX**1 and GX2**.

(10) Facility description in Section D.4(b) is amended as follows:

……

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a**n internal** dust collection system as particulate control~~, and exhausting to stack TX.~~

(11) References to Office of Air Management (OAM) is replaced with Office of Air Quality (OAQ).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Front Line Manufacturing
2466 North, 200 West
Warsaw, Indiana 46580

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-10773-00077	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: 3-29-2000

First Reopening No.: 085-13349 Issuance Date: 1-30-2002

1st Administrative Amendment No.: 085-17139	Pages Modified: 5, 6, 28, 30, 31, 38, 39
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:February 10, 2003

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary shower tub and sink manufacturing operation.

Responsible Official:	Ray Doss
Source Address:	2466 North, 200 West, Warsaw, IN 46580
Mailing Address:	P.O. Box 176, Leesburg, Indiana 46538
Phone Number:	219-269-1794
SIC Code:	3714
County Location:	Kosciusko
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively;

(b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X;

(c) two (2) gel spray guns, identified as (SG5 and SG6), each with a maximum capacity of 210.7 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG5X and SG6X, respectively;

(d) three (3) chop spray guns, identified as (SG7, SG8 and SG9), each with a maximum capacity of 797.3 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to three (3) stacks identified as SG7X, SG8X and SG9X, respectively;

(e) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as

particulate control, and exhausting to the interior of the building; and

(f) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using dry filters as particulate control, and exhausting to stacks GX1 and GX2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  (1) one (1) air makeup unit with a rated heat input of 2.75 million British thermal units (mmBtu) per hour;

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  (1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using an internal dust collection system as particulate control.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively; and
(b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel and chop spray guns (ID SG1-SG3) shall be the following:

(a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 47 tons (see Condition D.1.2), per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP085-8900-00077, issued on February 17, 1998, and 326 IAC 8-1-6 (General Reduction Requirements):

(a) Limiting the total resin input at 535.71 tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 5.6 percent flash off for non vapor suppressed (NVS) resin.

(b) Limiting the total resin input at 115.65 tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 14.7 percent flash off for non vapor suppressed (NVS) gel coat.

BACT for the gel and chop spray guns (ID SG1-SG3) shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.1.1. Compliance with this condition and Condition D.1.1 shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to this source.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
chop spray gun ID SG1	0.29	1.77
chop spray gun ID SG2	0.29	1.77
gel spray gun ID SG3	0.11	0.93

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM compliance with the VOC limit specified in Condition D.1.2 and the HAP limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.1.2 and the monomer content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel and chop spray guns (ID SG1-SG3) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel spray gun and chop spray gun stacks (ID SG1X-SG3X) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response

Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to the interior of the building;

(b) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using dry filters as particulate control, and exhausting to stacks GX1 and GX2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
fifteen (15) trimmer saws, ID (T2A-T2O)	1.02	4.15
Hand Grinder IDG	0.06	0.59

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no Compliance Monitoring Requirements for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

There are no Record Keeping and Reporting Requirements for these facilities.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  (1) one (1) air makeup unit with a rated heat input of 2.75 million British thermal units (mmBtu) per hour; and
(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  (1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using an internal dust collection system as particulate control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the grinding and machining operation is as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Hand Saw ID T	0.02	0.30

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour

shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour